

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

BRAZOS ELECTRIC POWER
COOPERATIVE, INC.,

Debtor¹

Chapter 11

Case No. 21-30725 (DRJ)

Re: Docket No. 1258

**STATEMENT OF THE AD HOC GROUP OF
MEMBER-OWNER DISTRIBUTION COOPERATIVES
IN SUPPORT OF THE DEBTOR'S SECOND MOTION FOR
ENTRY OF AN ORDER EXTENDING THE EXCLUSIVITY PERIODS
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

The Ad Hoc Group of member-owner distribution cooperatives (each, individually, a “**Member**,” and collectively, the “**Ad Hoc Group**”)² submits this statement in support of the *Debtor’s Second Motion for Entry of an Order Extending the Exclusivity Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Dkt. No. 1258] (the “**Motion**”)³ and respectfully states as follows:

1. The Ad Hoc Group believes that the Debtor’s request for an extension of the Exclusivity Periods is reasonable. Although the Debtor has made progress in the Chapter 11 Case, significant work remains to be done. The requested extension of the Exclusivity Periods will promote stability in the Chapter 11 Case and provide additional time for the Debtor to work with

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor’s claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor’s address is 7616 Bagby Avenue, Waco, TX 76712.

² The Members of the Ad Hoc Group are: (1) Bartlett Electric Cooperative, Inc.; (2) Comanche County Electric Cooperative Association; (3) Cooke County Electric Cooperative, Inc. d/b/a PenTex Energy; (4) Hamilton County Electric Cooperative Association; (5) Heart of Texas Electric Cooperative, Inc.; (6) J-A-C Electric Cooperative, Inc.; (7) Navasota Valley Electric Cooperative, Inc.; and (8) Wise Electric Cooperative, Inc.

³ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

stakeholders toward the Ad Hoc Group's ultimate goal of preserving safe, reliable, and affordable electric power for the thousands of retail customers who purchase it from the Members. Thus, under the present circumstances, the Ad Hoc Group respectfully submits that an extension of the Exclusivity Periods is warranted.

CONCLUSION

For the reasons stated above, the Ad Hoc Group respectfully urges the Court to enter an order granting the relief requested in the Motion and granting such other and further relief that it determines is appropriate under the circumstances.

Dated: November 24, 2021

Respectfully submitted,

/s/ Harry A. Perrin

Harry A. Perrin (Texas Bar No. 15796800)

Michael A. Garza (Texas Bar No. 24126797)

Kiran Vakamudi (Texas Bar No. 24106540)

VINSON & ELKINS LLP

1001 Fannin Street, Suite 2500

Houston, Texas 77002

Tel: (713) 758-2222

Fax: (713) 758-2346

hperrin@velaw.com

mgarza@velaw.com

kvakamudi@velaw.com

-and-

Jordan W. Leu (Texas Bar No. 24070139)

VINSON & ELKINS LLP

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201

Tel: (214) 220-7700

Fax: (214) 220-7716

jleu@velaw.com

**COUNSEL FOR THE AD HOC GROUP OF
MEMBER-OWNER DISTRIBUTION
COOPERATIVES**

CERTIFICATE OF SERVICE

I certify that on November 24, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Harry A. Perrin
Harry A. Perrin